

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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CLERK'S OFFICE
U.S. DISTRICT COURT
SAN JUAN, PR

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR
PUERTO RICO,**

as representative of

Debtors

PROMESA TITLE III

CIVIL NÚM. No. 17 BK 3283-LTS

(Jointly Administered)

MOTION REPLY TO THE JOINT OBJECTION OF CLAIM NO. 147132

TO THE HONORABLE COURT:

NOW COMES *Ms. Mabel Díaz Velázquez*, in my own right, and very respectfully state and pray, as follows:

1. I appear upon this Honorable Court to assess the opposing party's striking efforts that arose from an apparent criterion error that surfaced in my original proof of claim filing, filled in July 2, 2018, which I intend to clarify.
2. I was told by the Primer Clerk's office, and later ratified through a telephone conversation with this Honorable Court's PROMESA division, that the abovementioned claim request lacked a timeframe to further validate my eligibility for the unpaid benefits that I seek through the present claim.
3. Said benefits were enacted into law through Act No. 96-2002, under former Governor of Puerto Rico, Sila M. Calderón's Administration, recognizing that teachers and other eligible employees from the public sector were entitled to a salary raise of one hundred dollars per month (\$100.00/mo.), and or other benefits related to, or being assessed in, the case at hand.
4. To be eligible for this Honorable Court's ratification of said benefits, or any other compensation I may be entitled to, I was asked to present proof of my working tenure, which I am submitting with the present motion. As you will identify from the attached complimentary documents, produced by the *Government Employees Retirement System Administration*, I worked uninterruptedly for a span of 32 years, 7 months, 2 weeks and 1.80


days, up until my retirement back in August 1, 2013. This timeframe runs through the eligible criterion period, which stated that all public sector faculty members active through June 30, 2002 should have received the abovementioned benefits, regardless of their classification.

5. I have not being told that my claim lacked of any substantive data, other than a validation of my tenure, in order to determine if I was indeed an eligible recipient of the detained payments. If there is additional information I need to submit, I am open to do so as part of the discovery period or any other time frame ordered by this Respectable Court.
6. I hereby state once again, under penalty of perjury, that I suffered the referenced withholding, and that I have never, directly or indirectly, received any type of compensation in regards to said funds.
7. I hereby pray to this Honorable Court that it accepts the foregoing statement and validate my eligibility status, ordering the continuance of my claim, along with any other assessment it may deem plausible to order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 8th day of April, 2020.

IT IS CERTIFIED that on this same day, we deliver a copy of this Motion to all parties involved in the case, at their respective address on record.


MABEL DÍAZ VELÁZQUEZ
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